REMARKS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-43 are currently pending. Claims 11, 19, 27, 33, and 35-43 have been presently amended. No new matter has been added by the present amendment.

In the outstanding Office Action, Claims 1-43 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Publication No. 2004/0233855 to Gutierrez et al. (hereinafter "the '855 publication").

Regarding the rejection of Claims 11, 42 and 43 under 35 U.S.C. §101, Claims 11, 42 and 43 have been amended to recite a computer readable medium containing a program which, when executed, performs steps as described in the respective claims. See M.P.E.P. § 2106.01. As the claimed computer readable mediums contain programs which perform the steps recited in the claims, Applicant respectfully submits that the rejection of Claims 11, 42 and 43 has been rendered moot by the present amendments to those claims.

Regarding the rejection of Claim 1, specifically paragraphs [0066], [0080], [0082] and [0139] of the '855 publication which were cited in reference to the "route creation means for creating a plurality of the routes to the first communication terminal by duplicatively receiving the message," Applicant respectfully submits that the cited paragraphs do not disclose this feature.

First, paragraph [0066] of the '855 publication describes "assumptions" made by the network layer including (1) topology, (2) topological change rate, (3) sequence preservation, (4) flow control, (5) freedom from error, (6) connection establishment, (7) expedited data, and (8) security. Applicant respectfully submits that none of those eight assumptions discusses creating a plurality of routes to a communication terminal or duplicatively receiving a message.

Second, paragraph [0080] refers to Figure 5 and three fields of a message transferred between ad hoc network devices. Field 1 is a direction field, field 2 is an address list field, and field 3 is a data field. Of these three fields, the address list field is the only one that provides details regarding a route of communication. However, as described in the second half of paragraph [0080], the address list field 44 contains a single string of nodes. In other words, address list 44 is a list of nodes along a single path, not a plurality of routes. Thus, Applicant respectfully submits that paragraph [0080] also fails to teach creating a plurality of routes to a communication terminal or duplicatively receiving a message. Further, Fig. 5, which was referred to in paragraph [0080], shows only a single route between any two nodes in the network. As no plurality of nodes exists in the network, it is respectfully submitted that a plurality of routes to a communication terminal cannot be created, according to Fig. 5.

Third, paragraph [0082] of the '855 publication describes message 48 containing three fields. The first field is a direction field, the second field is an address list field, and the third field is a data field. These fields are synonymous to the three fields described with respect to paragraph [0080] and present no new information regarding the means for creating a plurality of routes to a communication terminal or duplicatively receiving a message.

Lastly, with regard to paragraph [0139] of the '855 publication, this paragraph describes the NWK_DATA primitive, its generation and its use. A situation where a duplicated message is received is described therein. Upon receiving a duplicate message the system responds by discarding the message and raising the debugging reception. The paragraph does not describe creating a plurality of routes in response to duplicatively receiving a message. Thus, Applicant respectfully submits that paragraph [0139] also fails to disclose means for creating a plurality of routes to a communication terminal by duplicatively receiving a message.

Applicants would also like to direct the Examiner's attention to the Summary of the

Invention, paragraph [0023] of the '855 publication which states in part:

> "[t]he ad-hoc network in accordance with the invention employs a
> network topology wherein a network controller (NC) controls a web of
> network devices (NDs), which may be connected directly to the NC or
> indirectly to the NC via one or more NDs. The source routing is dynamic, in
> that the preferred routing is constantly changeable based on operating
> conditions. However, unlike full source routing protocols, only the NC,
> which has relatively higher processing power and memory than the NDs
> connected thereto, includes all of the preferred routes between the NDs. In
> contrast, the NDs are relatively low power, low memory devices that have a
> simpler program than the NC. Instead, the NDs, upon initialization, engage in
> a neighbor discovery process, in which the 'best' multi-hop neighbor is
> discovered. In this manner, **the NC knows the entire roadmap of the ad-
> hoc network, <u>while each of the NDs only knows enough to ask its 'best'
> neighbor to pass the information along to its 'best' neighbor</u>, and so on,
> until the ultimate destination is reached.**"

Thus, Applicant respectfully submits that if the network controller is the only node in

the network that contains a complete network topology and the other nodes only know their

"best" neighbor, the '855 publication does not disclose <u>communication terminals comprising</u>

<u>route creation means for creating a plurality of routes to a first communication terminal by</u>

<u>duplicatively receiving a message</u>.

Independent Claims 3, 10-14, 19, 22, 25, 26, 27, 33, 36, 37, 41, 42, and 43 recite

features similar to features in Claim 1, except that some of these claims do not require the

feature of duplicatively receiving a message. However, since the art is deficient with regard

to disclosing or suggesting plural route creation, for similar reasons stated above with respect

to Claim 1, Applicant respectfully submits that the rejection of Claims 3, 10-14, 19, 22, 25,

26, 27, 33, 36, 37, 41, 42, and 43 (and all associated dependent claims) should be removed.

Thus, it is respectfully requested that independent Claims 1, 3, 10-14, 19, 22, 25, 26, 27, 33, 36, 37, 41, 42, and 43 (and all associated dependent claims) should be passed to allowance.
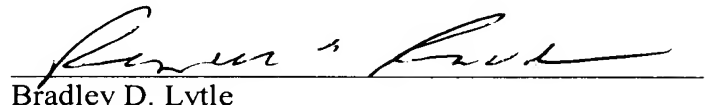
Consequently, in light of the above discussion, the outstanding grounds for rejection are believed to have been overcome. The present application is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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